

U.S. Patent Application No. 09/581,689  
Reply to Office Action dated September 30, 2005

PATENT  
450101-4689

### REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

#### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 23-143 are in the present application. It is submitted that these claims were patentably distinct over the prior art cited by the Examiner, and that these claims were in full compliance with the requirements of 35 U.S.C. § 112. The changes to the claims, as presented herein, are not made for the purpose of patentability within the meaning of 35 U.S.C. sections 101, 102, 103 or 112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

Claims 23, 31, 77, 129, and 136 were objected to because of various typographical informalities. These claims have been amended in accordance with the Examiner's comments. Hence, Applicants believe these objections have been overcome.

#### **II. REJECTIONS UNDER 35 U.S.C. § 112**

Claims 23-143 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for containing numerous unclear recitations and awkward wording. In response, Applicants have amended the claims to address each of the Examiner's comments on pages 3-15 of the Office Action. Hence, Applicants believe these rejections have been overcome.

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### III. REJECTIONS UNDER 35 U.S.C. § 102(e) and 35 U.S.C. § 103(a)

Claims 23-25, 28, 29, 31-33, 36, 37, 57, 58, 60-63, 65, 66, 68-71, 73, 74, 76-79, 81-86, 89-93, 96, and 119-143 were rejected under 35 U.S.C. § 102(e) as being anticipated by Raz et al. (U.S. Patent 5,913,227).

Claims 59 and 67 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz.

Claims 26, 27, 34, 35, 39-43, 45-48, and 51-54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Davison (U.S. Patent 6,430,592).

Claims 30, 38, 64, 72, 87, 88, 94, and 95 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Voeten et al. (U.S. Patent 5,528,282).

Claims 44, 50, and 56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Davison and Voeten.

Claims 49 and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Davison and Dewey et al. (U.S. Patent 5,301,324).

Claims 75 and 80 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Arsenault et al. (U.S. Patent 6,278,717).

Claims 97, 98, 102-104, and 108-111 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Dixon et al. (U.S. Patent 5,935,206).

Claims 99-101 and 105-107 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Raz in view of Dixon and Dewey.

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#### IV. RESPONSE TO REJECTIONS

In the present invention, "the upper control terminal means are connected through a network to controllers which are directly connected to said plurality of control targets." (Claim 23, all independent claims contain similar limitations) As shown in Figure 1, the present invention is directed to a transmission broadcast system where application computers (upper control terminals 11-13) are connected through a local area network 15 to a hierarchy of controllers which manage and control through direct connections the processing sections (control targets) of several AV servers 30, 40. The Examiner contends the features of the present invention are met by various combinations of Raz, Voeten, Davison, Dixon, Dewcy, and Arsenault. Applicants respectfully assert that none of the cited reference discloses the physical structure of the broadcast system shown in Figure 1 and recited in the present claims. Therefore, for at least this reason, Raz, Voeten, Davison, Dixon, Dewcy, and Arsenault fail to anticipate or obviate the present invention and the rejected claims should now be allowed.

#### V. DEPENDENT CLAIMS

The other claims in this application are each dependent from the independent claim discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

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### CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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